

November 11, 2014

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OFFICE OF GRIERAL : COUNSEL

Federal Election Commission
Office of Complaints Examination and Legal Administration
Attn: Kim Collins, Paralegal
999 E Street, NW
Washington, DC 20463

Re: FEC matter MUR 6829

Dear Ms. Collins:

Enclosed please find an addendum to our May 22, 2014 original complaint in this matter, alleging possible violations of the Federal Election Campaign Act of 1971, as amended, by Senator Ron Johnson and/or his campaign committee, and/or his leadership PAC, Strategy PAC.

Pursuant to your letter of May 28, 2014, we are submitting this additional information that we believe further clarifies that it continues to be unclear whether Senator Johnson is complying with federal campaign finance regulations.

Thank you for your consideration and review of this matter.

Scot_Ross/ Executive Director

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FEDERAL ELECTION COMMISSION COMPLAINT ADDENDUM

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On May 22, 2014, One Wisconsin Now filed an initial complaint against Senator Ron Johnson and Strategy PAC, requesting the FEC initiate an investigation into Senator Ron Johnson, his campaign committee (Ron Johnson for Senate) and Senator Johnson's PAC, Strategy PAC, for violations of FEC regulations, including but not limited to reporting and disclosure requirements. Since that time we have received additional information, which we are submitting for consideration:

- On October 15, 2014, the Ron Johnson for Senate committee filed its October Quarterly report with the FEC. It included disclosure of disbursement of \$12,281.31 to Wisconsin Institute for Law & Liberty (WILL) for legal fees (see page 331 of the report).
- 2. As we have previously reported to the FEC, WILL is providing legal services in the case of Johnson v. Office of Personnel Management (OPM), the fees for which were the basis of the original complaint filed by One Wisconsin Now.
- 3. The October Quarterly covers the period from July 1, 2014 through September 30, 2014, during which time Senator Johnson, by his attorneys, filed a 38-page appeal with the 7th Circuit, as reported by The Hill, on September 1, 2014.
- 4. Senator Johnson's FEC filings do not offer any insight as to what hourly rate is being charged by WILL for the services rendered, which he is paying for through is campaign account.
- 5. Without information as to what hourly rate is being charged and what hours have been charged for, it is impossible to determine whether Senator Johnson is paying a fair market rate for the legal services, and whether Senator Johnson is timely reporting these expenses as he incurs them, rather than delaying reporting the expenses until he receives and pays a bill from WILL, as raised in our original complaint and July addendum.

THEREFORE, One Wisconsin Now, by its Executive Director, Scot Ross, requests that the Federal Election Commission include the above information in its investigation into these allegations, find Senator Johnson and his respective committees in violation of applicable FEC regulations, and impose sanctions appropriate to these violations and take such further action as appropriate.

Verification

One Wisconsin Now, by its Executive Director, Scot Ross, hereby verifies that the statements made in the above Complaint Addendum are true and correct to the best of his

knowledge.

Scot Ross, Executive Director One Wisconsin Now 152 W. Johnson St., Suite 214 Madison, WI 53703

State of Wisconsin

County of Dane
Subscribed and sworn to before me on:
November 11, 2014

Jennier N. Dye
Notary Public – State of Wisconsin
My commission is permanent.

OF WISCONSIN